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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

PIOQUINTO FERNANDEZ-CARRANZA,

Defendant.

CASE NO. 2:21-CR-00086-TLN

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
FINDINGS AND ORDER

DATE: November 18, 2021
TIME: 9:30 a.m.
COURT: Hon. Troy L. Nunley

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant Pioquinto Fernandez-Carranza, by and through his counsel of record, hereby stipulate as follows:

1. By previous order, this matter was set for status on November 18, 2021.
2. By this stipulation, the defendant now moves to set the matter for a combination plea and sentencing hearing on February 10, 2022, at 9:30 a.m., and to exclude time between November 18, 2021, and February 10, 2022, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) The government has produced discovery associated with this case which consists of over 400 pages of discovery, as well as audio files. The government has also extended a plea agreement to the defendant under the Eastern District of California Fast-Track Immigration Prosecution Program.

1 b) Counsel for the defendant desires additional time to consult with his client, review
2 the current charges as well as the terms of the plea agreement offered by the government,
3 conduct investigation and research related to the charges, review discovery, and discuss potential
4 resolutions with his client.

5 c) Counsel for the defendant believes that failure to grant the above-requested
6 continuance would deny him the reasonable time necessary for effective preparation, taking into
7 account the exercise of due diligence.

8 d) The government does not object to the continuance.

9 e) Based on the above-stated findings, the ends of justice served by continuing the
10 case as requested outweigh the interest of the public and the defendant in a trial within the
11 original date prescribed by the Speedy Trial Act.

12 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
13 et seq., within which trial must commence, the time period of November 18, 2021, to February
14 10, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local
15 Code T4] because it results from a continuance granted by the Court at the defendant's request
16 on the basis of the Court's finding that the ends of justice served by taking such action outweigh
17 the best interest of the public and the defendant in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: October 21, 2021

PHILLIP A. TALBERT
Acting United States Attorney

/s/ SAM STEFANKI

SAM STEFANKI
Assistant United States Attorney

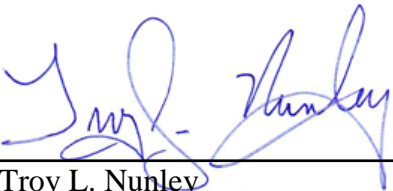
Dated: October 21, 2021

/s/ HOOTAN BAIGMOHAMMADI

HOOTAN BAIGMOHAMMADI
Counsel for Defendant
PIOQUINTO FERNANDEZ-CARRANZA

FINDINGS AND ORDER

IT IS SO FOUND AND ORDERED this 21st day of October, 2021.



Troy L. Nunley
United States District Judge